

R 011340Z OCT 20

MARADMIN 585/20

MSGID/GENADMIN/CMC L WASHINGTON DC//

SUBJ/ AQUEOUS FILM FORMING FOAM (AFFF) USAGE AND SPILL REPORTING//

REF/A/MSGID: DOC/ASD SUSTAINMENT OSD/MEMORANDUM/13 JAN 20//

REF/B/MSGID: DOC/CMC/MCO 3504.2A/7 AUG 13//

REF/C/MSGID: DOC/CMC/MCO 11000.11A/16 AUG 17//

REF/D/MSGID: DOC/CMC/MCBUL 11000/21 FEB 20//

REF/E/MSGID: DOC/CMC DC I&L (LF)/MCICOM POLICY LETTER 6-15//

REF/F/MSGID: DOC/DASN ENVIRONMENT/MEMORANDUM/17 JUN 16//

NARR: REF A IS OFFICE OF THE SECRETARY OF DEFENSE (OSD) MEMORANDUM, AQUEOUS FILM FORMING FOAM USAGE AND SPILL REPORTING. REF B IS MCO 3504.2A, OPERATION EVENT/INCIDENT REPORT (OPREP-3) REPORTING. REF C IS MCO 11000.11A, MARINE CORPS FIRE PROTECTION AND EMERGENCY SERVICES PROGRAM. REF D IS MCBUL 11000, PERFLUOROOCTANE SULFONATE (PFOS) AND PERFLUOROOCTANOIC ACID (PFOA) TESTING AND CONTROL AND AQUEOUS FILM FORMING FOAM (AFFF) MANAGEMENT POLICY AND PROCEDURES. REF E IS CMC A/DC I&L (LF), COMMCICOM POLICY LETTER FOR REPORTING REQUIREMENTS. REF F IS DEPARTMENT OF THE NAVY (DON), DEPUTY ASSISTANT SECRETARY OF THE NAVY (DASN) MEMORANDUM, AQUEOUS FILM FORMING FOAM (AFFF) CONTROL, REMOVAL, AND DISPOSAL.//

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GENTEXT/REMARKS/1. Situation. In July 2019, the Secretary of Defense created a Perfluorooctanesulfonic (PFOS) and Polyfluoroalkyl Substances (PFAS) Task Force to develop policies and procedures to address releases of these substances and the effects on military installations and surrounding communities. Aqueous Film Forming Foam (AFFF) is used as a fire extinguishing agent for flammable and combustible liquid firefighting and has historically contained PFAS. In January 2020, OSD established policy (reference (a)) requiring all AFFF usage and releases to be tracked and reported.

2. Mission. Commanders shall ensure the reporting of AFFF uses, releases, and spills to higher headquarters to meet the requirements established in the references.

3. Execution.

3.a. Commander's Intent.

3.a.1. Purpose. This MARADMIN establishes reporting guidance for uses, releases, and spills of AFFF and updates the reporting guidance in references (b), (d), and (e). This guidance is applicable to all Marine Corps organizations per the references.

3.a.2. Method. Establish a layered reporting requirement. Unit operations centers, installation environmental offices, and fire and emergency services (F&ES) departments shall update policies and procedures for tracking and reporting AFFF uses, releases, and spills through a combination of HQMC Environmental (LF)-directed guidance,

installation commander's verification of compliance, and unit commanders' engagement.

3.a.3. End State. 100% reporting of all AFFF incidents that meet notification requirements and deadlines to ensure complete visibility through the chain of command to HQMC.

3.b. Tasks.

3.b.1. Assistant Deputy Commandant, Installation and Logistics (Facilities) (LF).

3.b.1.a. Coordinate with the Deputy Commandant, Plans, Policies, and Operations and Deputy Commandant, Aviation to enable compliance with AFFF reporting requirements.

3.b.1.b. Provide amplifying guidance as appropriate based on lessons learned and guidance from higher headquarters.

3.b.2. Commander, Marine Corps Installations Command (MCICOM).

3.b.2.a. Coordinate installation, Fleet Marine Forces (FMF), and tenant organization actions to achieve directed end state. Provide unit commanders with visibility of requirements in the references.

3.b.2.b. Establish procedures to verify completion of AFFF reporting, clean-up, and disposal requirements in references (a), (d), and (f).

3.b.2.c. Ensure dissemination of references (a), (d), and (f) to FMF and tenant organizations that utilize AFFF products in facilities, vehicles, or equipment.

3.b.3. Commanders of Fleet Marine Forces and Installation Tenant Commands.

3.b.3.a. Ensure all command emergency operations centers and ground /aviation safety officers understand the reporting requirements contained in this MARADMIN.

4. Coordinating Instructions.

4.a. Per reference (a), all AFFF uses, releases, and spills, regardless of cause or volume, must be tracked and reported. This reporting requirement applies to both accidental and emergency response (firefighting) releases from fire suppression systems in hangars, F&ES and Aircraft Rescue and Firefighting (ARFF) tactical or garrison apparatuses, and incidents that Marine Corps F&ES and ARFF respond to, regardless of incident location (on or off the installation).

4.b. For all AFFF uses, releases, and spills:

4.b.1. All incidents must be reported as soon as they are discovered to the installation environmental office and the installation F&ES, ARFF, or Expeditionary Fire Rescue (EFR) and bulk fuel units. The environmental office shall enter incident information into the Environmental Management Portal Environmental Data Repository (EM-Portal EDR) and the F&ES, ARFF, or EFR shall enter incident information into the Marine Corps Fire Incident Reporting System (MCFIRS).

4.b.2. Unless it is a Significant Incident as defined in paragraph

4.b.3. below, reporting shall be completed by the installation environmental office within three working days after the release. For Significant Incidents, the timelines and procedures outlined in

paragraph 4.b.3. shall be followed.

4.b.3. For all uses, releases, and spills of more than 10 gallons of AFFF concentrate or more than 300 gallons of AFFF mixed foam, or any other situation that may receive media attention (Significant Incident):

4.b.3.a. A voice report to the Headquarters Marine Corps Operations Center (MCOC) and MCICOM Watch Officer per references (b) and (e) shall be completed within 30 minutes of becoming aware of such an event.

4.b.3.a.1. The MCOC Watch Officer can be reached at comm: 703-695-5454, DSN 312-223-4397, or email: hqmc.mcc2@usmc.mil.

4.b.3.a.2. The MCICOM Watch Officer can be reached at comm: 703-693-7171, DSN 312-223-7171, or email: mcicom.watch@usmc.mil.

4.b.3.b. Per reference (b), an Operations Events/Serious Incident Report (OPREP-3) (SIR) message shall be submitted within six hours of any significant incident (or within six hours of becoming aware of any significant incident.) Message reports shall be classified in accordance with their content and submitted in accordance with the format and examples provided in references (a), (b), and (e).

4.b.3.c. The voice and message reports shall include as much information as is available, but should at a minimum contain the date, time, location, unit/installation/personnel involved, cause of spill, amount (gallons) spilled, and a general description of the event or incident.

4.b.3.d. In addition, the installation environmental office shall provide an AFFF Release and Response Reporting Spreadsheet from reference (a) within six hours of any Significant Incident (or within six hours of becoming aware of any Significant Incident) for submission to OSD.

4.c. Location-Based Requirements of Uses, Releases, and Spills Reporting.

4.c.1. All AFFF uses, releases, and spills on installation facilities or property (e.g., hangars, motor pools, outlying airfields) or installation-assigned Table of Equipment (T/E), tactical or garrison (e.g., AS32P-19R, mounted/unmounted Fire Suppression Systems), shall be reported by the installation commander or representative per paragraph 4.b.

4.c.2. For all off-installation AFFF uses, releases, and spills by the FMF (e.g., MWSS, CLB), unit commanders shall comply with local procedures and simultaneously report to the nearest Marine installation environmental office and installation commander or direct representative. The responsible unit shall work with range management for site remediation and continuous reporting per paragraph 4.b.

5. Administration and Logistics.

5.a. Administration.

5.a.1. All references, including Defense Logistics Agency (DLA), DoD, and DON, policies can be obtained online or with support from installation environmental offices.

5.a.1.a. DoD Policies:

<https://www.defense.gov/Explore/Spotlight/pfas/>

5.a.1.b. DON Policies:

<https://www.secnave.navy.mil/eie/pages/pfc-pfas.aspx>

5.a.1.c. DLA Qualified Product Database (QPD):

<https://qpldocs.dla.mil/search/parts.aspx?qpl=1910>

5.a.1.d. DLA Qualified Product List (QPL):

<https://qpldocs.dla.mil/search/parts.aspx?qpl=1910>

5.b. Logistics.

5.b.1. Installation, tenant, and FMF commanders shall only procure MILSPEC (MIL-PRF-24385F(4)) AFFF from DLA's QPD and select from inventory populated in the QPL.

5.b.1.a. Procurement waivers may be granted on a case-by-case basis in support of emergency replenishment for contingency operations and installation protection. Waivers shall be submitted to the F&ES, ARFF or Environmental POCs listed above for adjudication. Final approval authority will be issued by HQMC (LFF)/ MCICOM (GF).

6. Command and Signal.

6.a. Command.

6.a.1. This MARADMIN is applicable to the Total Force.

6.a.2. For questions regarding this MARADMIN, AFFF, or environmental release reporting, contact the POCs listed above.

6.b. Signal.

6.b.1. This MARADMIN is effective upon release. Ensure widest dissemination.

7. Release approved by LtGen C. G. Chiarotti, Deputy Commandant, Installations and Logistics.//